

1 Anthony M. Barnes (SBN 199048)  
2 amb@atalawgroup.com  
3 AQUA TERRA AERIS LAW GROUP  
4 4030 Martin Luther King Jr. Way  
Oakland, CA 94609  
Telephone: (917) 371-8293

5  
6 Drevet John Hunt (SBN 240487)  
dhunt@cacoastkeeper.org  
7 CALIFORNIA COASTKEEPER ALLIANCE  
8 4122 Balboa Street  
San Francisco, CA 94121  
9 Tel: (415) 606-0864

10 Attorneys for Plaintiffs  
11 Los Angeles Waterkeeper  
California Coastkeeper Alliance

12  
13 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

14  
15 LOS ANGELES WATERKEEPER, A  
16 California non-profit corporation,  
17 COASTKEEPER ALLIANCE, A California  
non-profit corporation,

Case No.: 2:22-cv-07537-MWF-MAR

NOTICE OF TENTATIVE  
SETTLEMENT

18  
19 Plaintiffs,

vs.

20  
21 ESTES EXPRESS LINES, INC., a  
Maryland corporation,

22  
23 Defendant.

1 PLEASE TAKE NOTICE that the parties have reached a *tentative* settlement in  
2 this proceeding. Their agreement is reflected in the proposed Consent Decree attached to  
3 this notice as “**Exhibit 1**,” a copy of which has been sent to the United States Department  
4 of Justice (“DOJ”) and the United States Environmental Protection Agency (“EPA”) for a  
5 45-day review period as required under section 135.5 of Title 40 of the Code of Federal  
6 Regulations. Plaintiff will provide the Court with the written notice of commencement of  
7 the 45-day review period once Plaintiff receives that notice from DOJ. At the end of the  
8 45-day review period, Plaintiff will notify the Court of any objections received from the  
9 reviewing agencies and will submit the proposed Consent Decree for consideration and  
10 approval by this Court.

11 Should the Court require any additional information, the undersigned will be  
12 pleased to provide it upon request.

13

14

15 Dated: December 19, 2022

Respectfully submitted,

16

17

/s Anthony M. Barnes

18

Anthony M. Barnes

19

AQUA TERRA AERIS LAW GROUP

20

Attorneys for Plaintiffs

21

Los Angeles Waterkeeper and California

22

Coastkeeper Alliance

23

24

25

26

27

28